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23 *Attorneys for Plaintiff Navajo Health Foundation —
 Sage Memorial Hospital, Inc.*

24 **UNITED STATES DISTRICT COURT**

25 **DISTRICT OF NEVADA**

26 Navajo Health Foundation – Sage Memorial
 27 Hospital, Inc. (doing business as “Sage
 28 Memorial Hospital”), an Arizona nonprofit
 corporation,

29 Case No.: 2:25-cv-00834-JCM-NJK

30 Plaintiff,

31 v.

32 Kory Razaghi, an individual; and Attentus
 33 LLC, a Nevada limited liability company,

34 Defendants.

35 **MOTION FOR EXTENSION FOR
 36 ATTORNEYS TO FILE VERIFIED
 37 PETITION FOR ADMISSION TO
 38 PRACTICE IN THIS CASE ONLY**

39 **(First Request)**

40 Plaintiff Navajo Health Foundation – Sage Memorial
 41 Hospital, through its counsel, the law firm of Dickinson Wright PLLC, hereby moves the court for an
 42 extension of time to file D. Samuel Coffman’s, Bradley A. Burns’, Amanda E. Newman’s, and Turner
 43 S. Smith’s Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to

1 the Bar of This Court and Designation of Local Counsel. This Motion is made pursuant to LR IA 6-1
 2 and LR 7-2 and supported by the following Memorandum of Points and Authorities.

3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 Plaintiff respectfully requests that the Court extend the deadline for D. Samuel Coffman,
 5 Bradley A. Burns, Amanda E. Newman, and Turner S. Smith to file their Verified Petitions for
 6 Permission to Practice in this Case Only. The Verified Petitions are currently due by May 28, 2025.
 7 (ECF No. 2). Good cause exists for extending this deadline as counsel are waiting for the Supreme
 8 Court of Arizona to issue Mr. Coffman's, Mr. Burns', Ms. Newman's, and Mr. Smith's Certificates
 9 of Good Standing.

10 On May 13, 2025, the law firm of Dickinson Wright PLLC filed a Complaint on behalf of
 11 Plaintiff. (ECF No. 1). Attorney Brooks T. Westergard, admitted to practice in this Court, and
 12 attorneys D. Samuel Coffman, Bradley A. Burns, Amanda E. Newman, and Turner S. Smith, licensed
 13 to practice law in the state of Arizona, appeared as counsel for Plaintiff. (*Id.*) Prior to filing the
 14 Complaint, Dickinson Wright PLLC requested Certificates of Good Standing from the Arizona
 15 Supreme Court for Mr. Turner, Mr. Burns, and Ms. Newman on May 2, 2025, and requested a
 16 Certificate of Good Standing from the Arizona Supreme Court for Mr. Coffman on May 1, 2025. The
 17 Arizona Supreme Court has not indicated when those requests will be processed.

18 Based on the forgoing, and in an abundance of caution, Plaintiff is requesting a sixty-day
 19 extension to file Mr. Coffman's, Mr. Turner's, Mr. Burns', and Ms. Newman's Verified Petitions.
 20 Plaintiff respectfully submits that good cause exists for this brief extension in light of the uncertainty
 21 surrounding when the Certificates of Good Standing will be processed by the Arizona Supreme Court.
 22 Once the Certificates of Good Standing are obtained, Plaintiff will promptly file Verified Petitions.

23 DATED: this 28th day of May, 2025.

24 **DICKINSON WRIGHT PLLC**

25 */s/ Brooks T. Westergard*
 26 Brooks T. Westergard
 27 D. Samuel Coffman (*pro hac vice* to be filed)
 28 Bradley A. Burns (*pro hac vice* to be filed)
 Amanda E. Newman (*pro hac vice* to be filed)
 Turner S. Smith (*pro hac vice* to be filed)

*Attorneys pfor Plaintiff Navajo Health
 Foundation — Sage Memorial Hospital*

EXHIBIT 1

[Proposed] Order Granting Motion For Extension For
Attorneys To File Verified Petition For Admission To
Practice In This Case Only

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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

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17 Navajo Health Foundation – Sage Memorial
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23 LLC, a Nevada limited liability company,

24 Defendants.

25 Case No.: 2:25-cv-00834-JCM-NJK

26
ORDER GRANTING
MOTION FOR EXTENSION FOR
ATTORNEYS TO FILE VERIFIED
PETITION FOR ADMISSION TO
PRACTICE IN THIS CASE ONLY

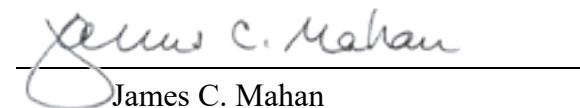
27
28 Presently before the Court is Plaintiff Navajo Health Foundation – Sage Memorial Hospital,
Inc. d/b/a Sage Memorial Hospital’s Motion for Extension for Attorneys to File Verified Petition for
Admission to Practice in this Case Only. Plaintiff seeks a sixty-day extension of time for D. Samuel

1 Coffman, Bradley A. Burns, Amanda E. Newman, and Turner S. Smith to file their Verified Petitions
2 in order to allow counsel to obtain their Certificates of Good Standing from the Supreme Court of
3 Arizona. Good cause appearing,

4 IT IS HEREBY ORDERED Plaintiff's Motion is GRANTED. Mr. Coffman, Mr. Burns, Ms.
5 Newman, and Mr. Smith shall have up to and including Monday, July 28, 2025, to file their Verified
6 Petitions.

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11 IT IS SO ORDERED.

12 Dated: June 2, 2025
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16 James C. Mahan
17 Judge, United States District Court
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